



208833

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5

IN THE MATTER OF:	)	Docket No. <u>V-W- '04-C-789</u>
	)	
	)	
Rogers Cartage Company	)	ADMINISTRATIVE ORDER
	)	DIRECTING COMPLIANCE
Sauget, Illinois	)	WITH REQUEST FOR
	)	ACCESS
	)	

Proceeding under Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), 42 U.S.C. § 9604(e).

I. PREAMBLE

This Administrative Order ("Order") is issued to Rogers Cartage Company ("Rogers" or "Respondent"), the present owner of the property upon which access is required, the area referred to as the "Rogers Property" on the map attached hereto, located in Sauget, Illinois.

This Order is issued pursuant to the authority vested in the President of the United States by Section 104(e)(5) of CERCLA, and delegated to the Administrator of the United States Environmental Protection Agency (U.S. EPA) by Executive Order No. 12580, 52 Fed. Reg. 2923 (1987), further delegated to the Regional Administrator by U.S. EPA Delegation No. 14-6, and further delegated to the Director of the Superfund Division by Regional Delegation 14-6.

This Order pertains to the Rogers Property, which is located adjacent to Sauget Area One sites L and H, which are source areas to a larger Superfund Site known as Sauget Area One. The Sauget Area One Site is currently the subject of a separate Administrative Order by Consent

(AOC) signed on January 21, 1999, by U.S. EPA and Solutia, Inc. and Monsanto Company (the "AOC respondents") requiring a detailed Remedial Investigation and Feasibility Study (RI/FS) and Engineering Evaluation/Cost Assessment (EE/CA) of the Area One Site. This Order Directing Access requires Respondent Rogers Cartage to grant U.S. EPA and its officers, employees, duly delegated representatives, and contractors, including representatives and agents of the AOC respondents Monsanto and Solutia, entry and access to portions of the Respondent's property for the purpose of conducting the sampling and investigation activities required by the January 21, 1999, AOC. The specific purpose of such sampling and investigation is to characterize nature and extent the dense non-aqueous phase liquids (DNAPL) in the Area One groundwater and to enable the AOC Respondents to propose remedial alternatives to address the imminent and substantial endangerment to public health and the environment caused by the release or threat of release of hazardous substances from the Area One Site.

By copy of this Order, the State of Illinois has been notified of the issuance of this Order.

## II. FINDINGS OF FACT

Based upon information available on the date of issuance of this Administrative Order, the Director of the Superfund Division of U.S. EPA, Region 5, makes the following findings of fact:

1. The property subject to this order, labeled as the "Rogers Property" on the attached map, is located in Sauget, Illinois. The Rogers Property is located at Falling Spring Road and Nickell Street in Sauget, Illinois, parcel number 409-001. The Rogers Property is currently graded and covered with crushed stone, contains a warehouse and office building and is used for

truck cleaning, repair and parking. The property also contains a working groundwater monitoring well (Well No. EE-04).

2. The Sauget Area One Site has been proposed by U.S. EPA for inclusion on the CERCLA National Priorities List (NPL) of Superfund Sites. The Sauget Area One Site is currently subject to a CERCLA Section 106 AOC signed on January 21, 1999, by U.S. EPA and Solutia and Monsanto. That AOC requires Solutia and Monsanto to investigate and sample for the presence of hazardous substances on the Area One Site and to propose appropriate measures to remediate the contamination found. The Rogers Property is located within 200 yards of sites L and H, which are source areas of contamination of the larger Sauget Area One Site. The Rogers property also contains a working groundwater monitoring well which can provide relevant information concerning characteristics of the area groundwater. Access to the Rogers Property is required to complete the sampling and investigation required by the January 21, 1999, AOC.

3. The source areas for Sauget Area One consist of six known disposal areas adjacent to, or in close proximity of, Dead Creek. The six disposal areas are known as sites I, H, G, L, M and N. Site L is the former location of two surface impoundments used from approximately 1971 to 1981 for the disposal of wash water from truck cleaning operations. This site is now covered by black cinders and is used for equipment storage. On information and belief, site L wastes have migrated into Sauget Area One site M. Site H occupies approximately 5 to 7 acres of land. Site H is connected to site I under Queeny Avenue and together they were known to be part of the Sauget-Monsanto Landfill which operated from approximately 1931 to

1957. Site H is not currently being used and the property is graded and grass-covered with some areas of exposed slag.

4. Information on the types of wastes disposed of and the types and levels of contamination found at the Sauget Area One Site, including sites L and H, have been provided to U.S. EPA from various sources including, but not exclusively from: 1) CERCLA 103(c) Submittals; 2) CERCLA 104(e) Responses; 3) Expanded Site Investigation Dead Creek Project Sites (E & E, 1988); 4) Removal Action Plan for Dead Creek Sites (Weston-SPER, 1987); 5) Description of Current Situation at the Dead Creek Project Sites (E & E, 1986); 6) Site Investigations for Dead Creek Sector B and Sites L and M (Geraghty & Miller, Inc. 1992); 7) Site Investigation/Feasibility Study for Creek Segment A (Advent Group, 1990); 8) Preliminary Ecological Risk Assessment for Sauget Area 1, Creek Segment F (E & E 1997); 9) EPA Removal Action Report for Site G (E & E 1994); 10) Area One Screening Site Inspection Report; and 11) Site Investigation Feasibility Study for Creek Segment A (Advent Group 1990).

5. The volume of contaminated fill material in site L is not known, however, the area of the impoundment is estimated to be 7,600 square feet. On information and belief, there is no known containment of wastes beneath site L. Soil samples collected at site L revealed elevated levels of VOCs such as chloroform (20,253 ppb), benzene (4,177 ppb), and toluene (26,582 ppb). Elevated levels of SVOCs were also detected such as 2-chlorophenol (2,152 ppb), pentachlorophenol (58,228 ppb), and di-n-butyl phthalate (2,784 ppb). Total PCBs were found at a level of 500 ppm in soils. Elevated levels of metals were detected such as antimony (32 ppm), arsenic (172 ppm), and nickel (2,392 ppm). Groundwater samples collected from beneath site L

revealed elevated levels of VOCs such as chloroform (730 ppb) and benzene (150 ppb). SVOCs were also detected in groundwater such as phenol (150 ppb), 2-chlorophenol (130 ppb), 4-methyl phenol (75 ppb), 2-nitrophenol (41 ppb), and 4-chloroaniline (60 ppb). Elevated levels of metals in groundwater included arsenic (14,000 ppb), cadmium (32 ppb) and zinc (2,210). Chemical wastes were disposed of in site H from approximately 1931 to 1957. Wastes included drums of solvents, other organics and inorganics, including PCBs, para-nitro-aniline, chlorine, phosphorous pentasulfide, and hydrofluosilic acid. Municipal wastes were also reportedly disposed of at site H. The estimated volume of wastes in site H is 110,000 cubic yards. There is no containment beneath site H. Soil samples collected at site H revealed elevated levels of VOCs such as benzene (61,290 ppb), tetrachloroethene (5,645 ppb), toluene (76,450 ppb), chlorobenzene (451,613 ppb), ethyl benzene (12,788 ppb), and total xylenes (23,630 ppb). Elevated levels of SVOCs were also found in soil samples such as 1,4-dichlorobenzene (30,645,161 ppb), 1,2-dichlorobenzene (19,354,839 ppb), 1,2,4-trichlorobenzene (7,580,645 ppb), 4-nitroaniline (1,834,000 ppb), phenanthrene (2,114,000 ppb), and fluoranthene (1,330,000 ppb). Soil samples also revealed elevated levels of PCBs such as arochlor 1260 (18,000,000 ppb), and pesticides 4,4-DDE (780 ppb), 4,4-DDD (431 ppb), and 4,4-DDT (923 ppb). Elevated levels of metals were found such as arsenic (388 ppm), cadmium (294 ppm), copper (2,444 ppm), lead (4,500 ppm), manganese (36,543 ppm), mercury (3.9 ppm), nickel (15,097 ppm), silver (44 ppm), and zinc (39,516 ppm). Groundwater samples collected from beneath site H revealed elevated levels of VOCs such as chloroform (3,000 ppb), benzene (4,300 ppb), and toluene (7,300 ppb). Elevated levels of SVOCs were detected in groundwater such as phenol

(950 ppb) and pentachlorophenol (650 ppb). An elevated level of PCBs (arochlor 1260 at 52 ppb) was also detected in groundwater at site H. Elevated levels of metals were also detected in groundwater such as arsenic (8,490 ppb), copper (2,410 ppb), nickel (17,200 ppb) and cyanide (480 ppb).

6. The January 21, 1999, AOC signed by U.S. EPA, Monsanto and Solutia cites the following U.S. EPA findings constituting an imminent and substantial threat to public health, welfare and the environment at the Site:

- a. actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, pollutants or contaminants; this factor is present at the Site due to the presence of elevated levels of contaminants, including VOCs, SVOCs, PCBs, dioxins, pesticides, and metals, in the surface soils, sediments and surface water of the disposal areas of the Site (i.e., sites I, H, G, L, M, and N) and in all segments of Dead Creek (Creek Segment (CS)-A through CS-F).
- b. actual or potential contamination of drinking water supplies or sensitive ecosystems; this factor is present at the Site due to the presence of elevated levels of contaminants, including VOCs, SVOCs, and metals, in groundwater. Although the source of drinking water for local residents is assumed to be primarily from surface water sources located upstream of the Site, many residences in the Site area continue to use private wells for domestic uses, which could include occasional uses for drinking water purposes. Further, contaminated groundwater is discharging into Dead Creek and adjacent wetland areas. Elevated levels of VOCs, SVOCs and metals have been detected

in the creek water and adjacent wetland areas particularly in Creek Segment CS-F. Dead Creek and its wetland areas contain a variety of ecosystems which may be damaged by the types of contamination found at Sauget Area One.

c. high levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate; this factor is present at the Site due to the existence of elevated levels of VOCs, SVOCs, PCBs, dioxins and metals in soil at the Site.

d. weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released; this factor is present at the Site due to existence of elevated levels of VOCs, SVOCs, PCBs, dioxins and metals in the sediments of Dead Creek which may be spread to surrounding residential and commercial properties during high water periods in the creek or during dry weather periods causing the sediments to become exposed and susceptible to wind action.

e. threat of fire or explosion; this factor is present at the Site due to the fact that fires have occurred on site G as a result of incompatible materials disposed of within this site. These fires have the ability to smolder for long periods of time and thereby release contaminants such as PCBs, dioxins and other organics into nearby residential areas and workplaces.

7. The actual or threatened release of hazardous substances from site L may present an imminent and substantial endangerment to the public health, welfare, or the environment within the meaning of Section 106(a) of CERCLA, 42 U.S.C. § 9606(a).

8. The January 21, 1999, AOC ordered the AOC respondents to perform, at a minimum, Site sampling and investigations as necessary to complete characterization of wastes present in Area One and to propose remedial alternative to address the wastes found. At a minimum, the AOC respondents are required to conduct a thorough source characterization to investigate physical and chemical aspects of the source materials and the materials in which they are contained at the Site. The characterization of these source areas is required to involve obtaining data relative to type, concentration and quantity of the waste materials present at each source area, including each's impact on area groundwater. Under the AOC, source characterization techniques include, but are not limited to, surface/subsurface soil sampling, soil gas sampling, geophysical investigations, the construction of test pits (trenches) and surface and ground water sampling. In addition, the AOC requires the AOC respondents to conduct a hydrogeologic investigation to further evaluate the subsurface geology and characteristics of the water bearing formations at and around the Site. The results of this study will be employed with existing Site data and the results of the source characterization to define groundwater flow patterns and the vertical and lateral extent of contaminant migration. U.S. EPA recently required the AOC respondents, under the "Additional Work" clause of the AOC, to conduct an additional detailed study of DNAPL in the Sauget Area groundwater. This DNAPL Study is to consist of:

a. DNAPL Survey and Recovery Tests at Existing Wells.

This Survey will be conducted to check for the possible presence of free-phase DNAPL at the existing wells and piezometers located at and near the Area One Site. In addition, recovery tests will be conducted at monitoring wells or piezometers locations that have the thickest



accumulation of DNAPL. A composite sample of DNAPL from each site will be prepared and submitted for laboratory analysis of physical and chemical properties.

b. Geophysical Survey

A three-dimensional seismic reflection survey will be conducted to map the topography of the bedrock surface in order to identify topographic lows where free phase DNAPL could potentially accumulate. The geophysical survey will cover an L-shaped area approximately 44.3 acres in size encompassing sites H, G, I, and L.

c. Soil Sampling and Installation of Piezometers

This is to characterize the nature and extent of residual and free-phase DNAPL potentially present with the fill areas and within the upper, middle, and deep hydrogeologic units underlying the fill areas, to investigate for possible presence of pooled DNAPL in topographic lows on the bedrock surface, and to evaluate the potential extent of residual and free-phase DNAPL outside the boundaries of the fill areas.

This Access Order is to provide access to the existing well and, as necessary, the drilling of a new well on Rogers Property.

9. Despite several attempts over the course of the last two months to negotiate the terms of an acceptable access agreement with the Respondent, the AOC respondents have been unable to acquire Respondent's voluntary consent for access to its property to conduct work required by the AOC.

### III. DETERMINATIONS OF LAW

Based upon information available on the date of issuance of this Administrative Order, the Superfund Division Director of U.S. EPA, Region 5, makes the following Determinations of Law:

1. Sauget Area One is a "facility" as defined by Section 101(9) of CERCLA, 42 U.S.C. § 9601(9).
2. The contaminants in the Area One Site, including but not limited to those listed in paragraph II. 5. of this Order Directing Access, are "hazardous substances" as defined by Section 101(14) of CERCLA, 42 U.S.C. § 9601(14), and as specified in 40 C.F.R. § 302.4.
3. Respondent is a "person" as defined by Section 101(21) of CERCLA, 42 U.S.C. § 9601(21).
4. Respondent is the present owner of property adjacent to Area One sites L and H, sites whose impact on Area One groundwater must be investigated. Respondent's Property contains a groundwater monitoring well from which samples must be taken to complete the Sauget Area One groundwater study.
5. The presence of hazardous substances at the facility or the past, present or potential migration of hazardous substances currently located at or emanating from the facility constitutes a reasonable basis to believe that there may be a "release" or substantial threat of "release," as defined in Section 101(22) of CERCLA, into the environment of a hazardous substance from or at the facility.

6. Access to the Respondent's property is necessary to effectuate a response action, including performing the sampling and analysis necessary to conduct the RI/FS required by the January 21, 1999, AOC.

#### IV. ORDER

Based upon the foregoing Findings of Fact and Determinations of Law, it is hereby ordered that Respondent comply with U.S. EPA's request for access to the Respondent's property described in Paragraph 1 of the Findings of Fact, above, pursuant to Section 104(e) of CERCLA, in accordance with Paragraphs 1 through 5 below:

1. As required by section 104(e)(3) of CERCLA, Respondent shall grant the U.S. EPA and its officers, employees, duly designated representatives, and contractors, including but not limited to employees, agents or contractors of Monsanto and Solutia, access to the Property for the purpose of conducting the sampling activities required by the January 21, 1999 AOC, as follows:

For a period of six months starting on May 17, 2004, at all reasonable times, Respondent shall allow entry to its property for DNAPL sampling and investigation activities described in paragraph II. 8. above.

2. This Administrative Order shall be binding on all employees, agents, successors and assigns of Respondent. In the event of any conveyance by Respondent, or Respondent's agents, heirs, successors and assigns, of any interest in any property which includes an access area, Respondent or Respondent's agents, heirs, successors and assigns, shall convey the interest so as to ensure continued access by U.S. EPA and/or its representatives for purposes of carrying

out the activities pursuant to this Order. Any such conveyance shall restrict the use of such property so that use will not interfere with activities undertaken pursuant to this Order.

Respondent, or Respondent's agents, heirs, successors and assigns, shall notify U.S. EPA at least (30) thirty days before any such conveyance of an interest in property where an access area is located, and shall notify the other parties involved in the conveyance prior to the transfer of the provisions in this Order.

3. Any action taken by Respondent to deny access to U.S. EPA and its officers, employees, duly designated representatives, and contractors, for the purpose of performing actions described in paragraph II. 8. above, or any attempt to interfere with the actions deemed necessary to complete these actions, shall be deemed a violation of this Administrative Order.

4. Nothing in this Order is meant to limit in any way any right of access to this property which U.S. EPA, the State of Illinois, and/or local governmental agencies, may have under any statute, regulation or agreement.

5. Upon completion of the sampling activities to be performed, all material and equipment, including any waste generated by the U.S. EPA and its officers, employees, duly designated representatives and contractors, shall be removed from the Property, and said Property will be restored as nearly as possible to the original state and condition that it was in prior to the sampling activities conducted under this Order.

#### V. CONFIDENTIAL BUSINESS INFORMATION

Respondent is hereby advised that, consistent with 18 U.S.C. § 1905, it may assert a confidentiality claim with respect to any information obtained by U.S. EPA in the course of

activities performed on its property under the authority of this Administrative Order. Information accorded protection by 18 U.S.C. § 1905 includes information relating to or concerning trade secrets, processes, operations, style of work, or apparatus, confidential statistical data, or to the identity, amount or source of any income, profits, losses or expenditures of any person, firm, partnership, corporation or association. Any such claim will be handled by U.S. EPA in accordance with the Confidential Business Information regulations, found at 40 C.F.R. § 2.201 et seq.

#### VI. ACCESS TO ADMINISTRATIVE RECORD

The Administrative Record supporting the above Findings and Determinations is available for review by appointment on weekdays between the hours of 9:00 a.m. and 5:00 p.m. in the Office of Regional Counsel, U.S. EPA, Region 5. Please contact Thomas Martin, Associate Regional Counsel, at (312) 886-4273 to make an appointment to review the Administrative Record.

#### VII. EFFECTIVE DATE OF ORDER AND OPPORTUNITY TO CONFER

1. This Order shall become effective on the fifth day after it is received by the Respondent.
2. Respondent may request a conference with U.S. EPA to discuss this Order. The conference may be held by telephone. Respondent may appear by an attorney or other representative. Any such conference shall take place within five days of Respondent's receipt of the Order. Respondent should contact Thomas Martin, Associate Regional Counsel, at (312) 886-4273 to arrange such a conference.

3. Any comments that Respondent may have regarding this Order, its applicability to Respondent, the correctness of any factual determination upon which the Order is based, or any other relevant and material issue may be reduced to writing and submitted to U.S. EPA within three days of Respondent's receipt of this Order. Any such comments should be sent via fax to Thomas Martin, Office of Regional Counsel (MAIL CODE C-14J), U.S. EPA - Region 5, 77 West Jackson Street, Chicago, Illinois 60604 at (312) 886-7160.

#### VIII. NOTICE OF INTENTION TO COMPLY

Whether or not Respondent requests a conference with U.S. EPA, Respondent must notify U.S. EPA within three day of receipt of the Order of its intent to comply fully or not comply with the Order. Respondent shall provide written notice to U.S. EPA stating whether it intends to comply with the terms hereof. Such notice shall be sent via fax (312-886-0740) and by overnight carrier, return receipt requested, to Thomas Martin, Office of Regional Counsel (C-14J), U.S. EPA - Region 5, 77 West Jackson Blvd., Chicago, Illinois 60604. Failure to provide such timely notice shall be deemed to be a refusal to grant access, constituting noncompliance with the terms of the Order.

#### IX. PENALTIES FOR NONCOMPLIANCE

Respondent is hereby advised that, pursuant to Section 104(e)(5)(B) of CERCLA, a Court may assess a civil penalty not to exceed \$32,500 per day for each day that a Respondent unreasonably fails to comply with this Order or any part hereof.

IT IS SO ORDERED this 7<sup>TH</sup> day of May, 2004.

By:  

Richard C. Karl, Acting Director  
Superfund Division  
United States Environmental  
Protection Agency  
Region 5

ATTACHMENTS:

1. Map of Property
2. Administrative Record Index



## ADMINISTRATIVE RECORD INDEX

U.S. ENVIRONMENTAL PROTECTION AGENCY  
REMEDIAL ACTION

ADMINISTRATIVE RECORD  
FOR  
SAUGET AREA 1 SITE WIDE  
SAUGET, ST. CLAIR COUNTY, ILLINOIS

ORIGINAL  
JULY 14, 2003

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	03/25/03	Weinig, W., Laramide Environmental, LLC	Fayoumi, N., U.S. EPA	E-Mail Transmission re: Comments on Work Plan for DNAPL Characterization and Remediation Study for Sauget Area 1	
2	03/26/03	Tetra Tech EM, Inc.	U.S. EPA	Letter Report for Sauget Sites H and I w/ Cover Letter	
3	04/00/03	Solutia, Inc./ Blasland, Bouck & Lee, Inc.	U.S. EPA	Quality Assurance/ Sampling and Analysis Project Plan for the Sauget Area 1 Dead Creek Sediment Removal Action Mitigation Plan (Revision 2)	
4	05/13/03	Solutia, Inc.	U.S. EPA	Workplan for DNAPL Characterization and Remediation Study for the Sauget Area 1 Sites	
5	05/30/03	Acree, S., U.S. EPA	Fayoumi, N., U.S. EPA	Memorandum re: Comments on the Workplan for DNAPL Characterization and Remediation Study for the Sauget Area 1 Sites	
6	06/06/03	Vandiver, G., Solutia, Inc.	Fayoumi, N., U.S. EPA	Letter re: Solutia's Response to Comments and Proposed Response Actions for the Dead Creek Final Remedy EE/CA at the Sauget Area 1 Site	

U.S. ENVIRONMENTAL PROTECTION AGENCY  
ADMINISTRATIVE RECORD  
FOR  
SAUGET AREA 1 (SITE WIDE)  
SAUGET AND CAHOKIA, ST. CLAIR COUNTY, ILLINOIS

ORIGINAL  
SEPTEMBER 17, 2002

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	00/00/00	Ecology and Environment, Inc.	U.S. EPA	Data Gaps Memorandum re: Sauget Area 1 and 2 Sites	10
2	00/00/00	Illinois EPA	File	CERCLA Preliminary Assessment Report for Sauget Area 1 Site M	100
3	00/00/00	Illinois EPA	File	CERCLA Preliminary Assessment Report for Sauget Area 1 Site P	28
4	00/00/00	Illinois EPA	File	CERCLA Screening Site Inspection Report: Volume 1 of 2 for Sauget Area 1 Sites	136
5	00/00/00	Illinois EPA	File	CERCLA Screening Site Inspection Analytical Results: Volume 2 of 2 for Sauget Area 1 Sites	24
6	00/00/00	Illinois EPA	U.S. EPA	CERCLA Screening Site Inspection Report: Volume 1 of 2 for Sauget Area 1 Sites	149
7	00/00/00	Illinois EPA	U.S. EPA	CERCLA Screening Site Inspection Analytical Results: Volume 2 of 2 for Sauget Area 1 Sites	163
8	00/00/00	McAteer, M., U.S. EPA	File	Statement by U.S. EPA Region 5 re: Residential Soil Sampling the Region Known as Sauget Area 1 Located in Sauget and Cahokia, IL	1
9	04/00/81	Illinois EPA	File	Report: A Preliminary Hydrogeologic Investigation in the Northern Portion of Dead Creek and Vicinity	131
10	07/00/86	Ecology and Environment, Inc.	Illinois EPA	Report: Description of Current Situation at the Dead Creek Project Sites	152

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11	12/26/86	Illinois EPA	U.S. EPA	Potential Hazardous Waste Site Preliminary Assessment Form for the Sauget Monsanto Landfill Site	10
12	05/00/88	Ecology and Environment, Inc.	Illinois EPA	Expanded Site Investigation for the Dead Creek Project Sites: Volume 1 of 2 (Final Report)	476
13	05/00/88	Ecology and Environment, Inc.	Illinois EPA	Expanded Site Investigation for the Dead Creek Project Sites: Volume 2 of 2 (Final Report)	556
14	10/03/88	Illinois EPA	File	CERCLA Preliminary Assessment Report for the Dead Creek Area G Site	80
15	01/20/89	Illinois EPA	File	CERCLA Preliminary Assessment Report for H.H. Hall Construction Site	41
16	09/05/91	Illinois EPA	File	CERCLA Preliminary Assessment Report for Sauget Area 1 Site L	145
17	04/01/92	Illinois EPA	File	CERCLA Preliminary Assessment Report for the Dead Creek Segment A Site	99
18	04/01/92	Illinois EPA	File	CERCLA Preliminary Assessment Report for the Dead Creek Segments C-F Sites	111
19	09/22/93	Illinois EPA	File	CERCLA Preliminary Assessment Report for P.T.'s Showclub Site	74
20	10/01/93	Belleville News-Democrat	Public	Newspaper Article: "Residents Worry About Contamination"	3
21	1994-1999	U.S. EPA	Public	U.S. EPA Administrative Record for Sauget Area 1 Site G (DOCUMENTS CONTAINED ON THE AR INDEXES ARE INCORPORATED BY REFERENCE INTO THE SITE WIDE AR)	3
22	09/30/94	Ecology and Environment, Inc.	U.S. EPA	Infrared Trouble-Shooting Report for Sauget Area 1 w/ Cover Letter	39
23	08/25/95	U.S. EPA	Public	U.S. EPA Environmental News Release: Sauget Site G Cleaned Up	2

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24	02/00/98	Ecology and Environment, Inc.	U.S. EPA	Sauget Area 1: Volume 1 (Data Tables/Maps)	412
25	02/00/98	Ecology and Environment, Inc.	U.S. EPA	Sauget Area 2: Volume 2 (Data Tables/Maps)	588
26	1999	Light, D., Solutia, Inc.	McAteer, M., U.S. EPA	Monthly Reports for 1999 for the Sauget Area 1 Sites	78
27	01/19/99	Muno, W., U.S. EPA	Light, D., Solutia, Inc.	Final Administrative Order by Consent for the Sauget Area 1 Site w/ Cover Letter	34
28	04/09/99	Solutia, Inc.	U.S. EPA	EE/CA and RI/FS Support Sampling Plan for Sauget Area 1: Volume 2- Appendix B (Soil, Groundwater, Surface Water, Sediment and Air FSP, QAPP and HASP)	159
29	06/25/99	Solutia, Inc.	U.S. EPA	EE/CA and RI/FS Support Sampling Plan for Sauget Area 1: Volume 1A (Support Sampling Plan)	866
30	06/25/99	Solutia, Inc.	U.S. EPA	EE/CA and RI/FS Support Sampling Plan for Sauget Area 1: Volume 1B (Human Health Risk Assessment Plan)	203
31	06/25/99	Solutia, Inc.	U.S. EPA	EE/CA and RI/FS Support Sampling Plan for Sauget Area 1: Volume 1D (EE/CA Work Plan)	59
32	06/25/99	Solutia, Inc.	U.S. EPA	EE/CA and RI/FS Support Sampling Plan for Sauget Area 1: Volume 2 (Soil, Groundwater, Surface Water, Sediment and Air FSP, QAPP, and HASP)	871
33	06/25/99	Solutia, Inc.	U.S. EPA	EE/CA and RI/FS Support Sampling Plan for Sauget Area 1: Volume 2 (Soil, Groundwater, Surface Water, Sediment and Air FSP, QAPP, and HASP and Laboratory Quality Assurance Plan)	265

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34	06/25/99	Solutia, Inc.	U.S. EPA	EE/CA and RI/FS Support Sampling Plan for Sauget Area 1: Volume 2 - Appendix A (Analytical Laboratory Standard Operating Procedures)	87
35	06/25/99	Solutia, Inc.	U.S. EPA	EE/CA and RI/FS Support Sampling Plan for Sauget Area 1: Volume 3 (Ecological Sampling - FSP, QAPP and HASP)	159
36	09/28/99	Light, D., Solutia, Inc.	McAteer, M., U.S. EPA	Report on Ecological Reconnaissance for Sauget Area 1 Dead Creek, Borrow Pit and Reference Areas Conducted September 20-22, 1999 w/ Cover Letter	18
37	11/19/99	Durley, S., Tetra Tech EM, Inc.	Blum, G., U.S. EPA	Letter re: Final Postcard for the Sauget Site	2
38	12/08/99	Cahokia-Dupo Herald	Public	Newspaper Article: "EPA Tackles Hot Spots"	2
	12/09/99	Belleville News-Democrat	Public	Newspaper Article: "Toxic Waste Proves Far Worse than Expected at Sauget Dump"	1
39	2000	Light, D., Solutia, Inc.	McAteer, M., U.S. EPA	Monthly Reports for 2000 for the Sauget Area 1 Sites	299
40	2000-2002	U.S. EPA	Public	U.S. EPA Administrative Record for the Sauget Area 1 Dead Creek Sediment Removal Site (DOCUMENTS CONTAINED ON THE AR INDEXES ARE INCORPORATED BY REFERENCE INTO THE SITE WIDE AR)	7
41	01/30/00	Cahokia-Dupo Journal	Public	Newspaper Article: "Plans for Dead Creek Starting to Take Shape"	1
42	02/00/00	U.S. EPA	Public	Fact Sheet: Investigation and Cleanup Continues at the Sauget Areas 1 & 2 Superfund Site	6
43	02/02/00	Cahokia-Dupo Herald	Public	Newspaper Article: "Cleanup Continues on Creek"	1

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44	02/29/00	U.S. EPA	Public	Agenda for the February 29, 2002 Public Meeting re: the Sauget Area 1 & 2 Superfund Sites	1
45	03/08/00	Clarion Journal	Public	Newspaper Article: "EPA Reports Progress - Dead Creek Evaluation Stand at 80 Percent Done"	2
46	03/14/00	Glosser, D., Illinois Department of Natural Resources	Prescott, T. IDNR	Memorandum re: IDNR Response to Request for Information Concerning Natural Resources and Recreation at Sites in the Sauget Area	5
47	03/15/00	Glosser, D., IDNR	Prescott, T. IDNR	Memorandum re: Follow-up to IDNR's Response to Request for Information Concerning Natural Resources and Recreation at Sites in the Sauget Area	2
48	06/01/00	Vaccarello, C., Tetra Tech EM, Inc.	Rosales, L., U.S. EPA	Final Fact Sheet for the Sauget Areas 1 and 2 Superfund Sites w/ Cover Letter	5
49	07/13/00	Light, D., Solutia, Inc.	McAteer, M., U.S. EPA	Figures: Undeveloped Area Sample Results/Locations for Sauget Area 1 w/ Cover Letter	32
50	08/00/00	O'Brien & Gere Engineers, Inc.	Solutia, Inc.	Tables: Sampling Results for Sauget Area 1 Sites for the Period July 7 - August 1, 2000	
51	08/25/00	Sukackas, E., Tetra Tech EM, Inc.	Rosales, L., U.S. EPA	Draft Revised Community Involvement Plan for the Sauget Areas 1 and 2 Superfund Sites w/ Cover Letter	34
52	08/30/00	Light, D, Solutia, Inc.	Addressees	Letter re: Residential Soil Sampling Results for the Sauget Area 1 Sites w/ Attachments	183
53	10/04/00	Cahokia-Dupo Herald	Public	Newspaper Article: "Sauget Officials Question Land-fill Plan"	4

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54	11/00/00	Advent Group Inc.	Solutia, Inc.	EE/CA and RI/FS Support Sampling Plan (Leachate Treatability Tests) for Sauget Area 1	325
55	12/01/00	Illinois Endangered Species Protection Board	File	Endangered and Threatened Species List	16
56	12/04/00	U.S. DOI/ Fish & Wildlife Service	File	Table: Results of Species Search from the Threatened and Endangered Species System	1
57	2001	Light, D., Solutia, Inc.	McAteer, M., U.S. EPA	Monthly Reports for 2001 for the Sauget Area 1 Sites	56
58	01/00/01	Solutia, Inc.	U.S. EPA	EE/CA and RI/FS Support Sampling Plan: Data Report for Sauget Area 1	421
59	01/00/01	Solutia, Inc.	U.S. EPA	EE/CA and RI/FS Support Sampling Plan: Data Report for Sauget Area 1- Volume 1, Section 4-11 (Groundwater, Soil, Surface Water, Sediment, Waste, Air and Biota Data Tables and Maps0	400
60	03/13/01	U.S. Army Corps of Engineers/	U.S. EPA	Executive Summary: Split Sampling Report for the Sauget Site 1 Project	204
61	06/00/01	Solutia, Inc.	U.S. EPA	EE/CA and RI/FS for Sauget Area 1 [Revision 1]: Volume II-Part A (Human Health Risk Assessment)[Revision 1]	432
62	06/00/01	Solutia, Inc.	U.S. EPA	EE/CA and RI/FS for Sauget Area 1 [Revision 1]: Volume II-Part B (Human Health Risk Assessment Summary Statistics)[Revision 1]	941
63	10/25/01	Tetra Tech EM, Inc.	U.S. EPA	Letter Report for Dead Creek Site G	35
64	11/28/01	Belleville News-Democrat	Public	Newspaper Article: "Dead Creek Could Get Much Cleaner in Weeks"	1



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65	2002	Light, D., Solutia, Inc.	McAteer, M., U.S. EPA	Monthly Reports for 2002 for the Sauget Area 1 Sites	35
66	2002	U.S. EPA	Public	U.S. EPA Administrative Record for the Sauget Area 1 Culvert Removal Action(DOCUMENTS CONTAINED ON THE AR INDEX ARE INCOR- PORATED BY REFERENCE INTO THE SITE WIDE AR)	2

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1	00/00/00	U.S. EPA	File	Chronology: Sauget Area 1 History	10
2	03/18/99	Light, D., Solutia, Inc.	McAteer, M., U.S. EPA	March 1999 Monthly Report for the Sauget Area 1 Sites	3
3	03/19/99	McAteer, M., U.S. EPA	Light, D., Solutia, Inc.	Letter re: U.S. EPA's Comments on the February 22, 1999 Revised Support Sampling Plan for the Sauget Area 1 Site	40
4	10/15/01	Light, D., Solutia, Inc.	Ribordy, M., U.S. EPA	October 2001 Monthly Report for the Sauget Area 1 Sites	6
5	03/30/01	Light, D., Solutia, Inc.	McAteer, M., U.S. EPA	Letter re: Solutia's Response to Comments and Revisions to the Human Health Risk Assessment Report for the Sauget Area 1 Sites	2
6	05/06/02	Ribordy, M., U.S. EPA	Smith, S., Solutia, Inc.	Letter re: U.S. EPA's Conditional Approval of the April 15, 2002 Revised RI/FS Support Sampling Plan for the Sauget Area 2 Site	5

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1	3/25/03	Laramide Environmental, LLC	Fayoumi, N., U.S. EPA	Comments on Sauget Area 1 DNAPL Work Plan	4
2	3/26/03	Tetra Tech, Inc.	Ribordy, M., U.S. EPA	Letter Report: Sites H & I	62
3	4/2003	BBL, Inc.	Fayoumi, N.,	QAPP, Dead Creek sed. Removal Action, U.S. EPA Mitigation	

Plan

4	5/13/03	Groundwater Services, Inc.	Fayoumi, N., U.S. EPA	DNAPL Work Plan
5	5/30/03	Acree, S., Applied Research & Technical Support Branch	Fayoumi, N., U.S.EPA	Letter re: Sauget Area 1 Superfund Site, Workplan for DNAPL Characterization & Remediation Study
6	6/6/03	Solutia, Inc.	Fayoumi, N., U.S. EPA	Letter re: Response to Comment and Proposed Response Actions, Dead Creek Final EECA, Sauget Area 1 Site
7	6/16/03	Tetra Tech, Inc.	Fayoumi, N., U.S. EPA	Draft Site Investigation Report, Site L, Sauget, St. Clair County, Illinois

## MAP OF PROPERTY

